

be given free leave to withdraw as a named plaintiff. *See, e.g., Ormond v. Anthem, Inc.*, No. 1:05-CV-1908-TWP-TAB, 2012 WL 1596321, at *2–3 (S.D. Ind. May 4, 2012) (allowing withdrawal of a named plaintiff and noting that “no plaintiff should be forced to remain a plaintiff involuntarily unless a compelling reason exists”) (citing *Organization of Minority Vendors, Inc. v. Illinois Central—Gulf R.R.*, No. 79 C 1512, 1987 WL 8997 * 1 (N.D.Ill. April 2, 1987) (allowing a motion to withdraw as representative plaintiffs and stating that “[a]bsent a good reason... a plaintiff should not be compelled to litigate if it doesn't wish to.”)).

Undersigned counsel has conferred with counsel for the Defendants, and they have no opposition to this Motion.

Accordingly, Young requests that it be withdrawn as a named plaintiff in the above-referenced matter, said withdrawal to be without prejudice to its future participation as an absent class member, should the Court grant class certification.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that I have, on the 30th day of September, 2016, served a copy of the foregoing Unopposed Motion for Voluntary Withdrawal of Young Executive Management & Consulting Services, Inc. as a Named Plaintiff on all counsel of record via electronic service by the court's CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

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